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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

Sean Bondocan,

Plaintiff,

v.

Trans Union, LLC; Equifax Information Services,  
LLC; Experian Information Solutions, Inc.; JP  
Morgan Chase Bank, N.A.; Synchrony Financial;  
American Express Inc.; Capital One Bank, N.A.;  
and Silver State Schools Credit Union,

Defendants.

Case No.: 2:23-cv-1334 -JCM-VCF

**Unopposed Motion for Extension of  
Time for TransUnion to Answer**

**(First Request)**

Sean Bondocan ("Plaintiff"), hereby files this Unopposed Motion for Extension of Time for TransUnion to Answer ("Motion") and in support states:

1. TransUnion's responsive pleading is due on September 20, 2023.
2. Plaintiff and Trans Union are actively engaged in case-resolution negotiations.
3. Plaintiff does not oppose an extension of Trans Union's time to respond to the Complaint so that the parties may devote their energies to resolving this matter.
4. Plaintiff files this Motion consistent with its agreement with TransUnion and further files this Motion respectfully requesting the Court for an extension of time for TransUnion to file its responsive pleading for 21 days, to **Wednesday, October 11, 2023**.
5. This motion is filed in good faith and not for delay.
6. This is the first request for an extension of time for TransUnion to answer the complaint and the requested extension does not prejudice the parties.

1 7. For the foregoing reasons, Plaintiff requests that the Court issue an order extending the date  
2 by which TransUnion must answer or otherwise respond to Plaintiff's Complaint to **October**  
3 **11, 2023.**

4 DATED September 20, 2023.

5  
6 Respectfully submitted,

7  
8 **FREEDOM LAW FIRM**

9 /s/ Gerardo Avalos  
10 George Haines, Esq.  
11 Gerardo Avalos, Esq.  
12 8985 S. Eastern Ave., Suite 100  
13 Las Vegas, NV 89123  
14 *Counsel for Plaintiff*

15  
16 **GOOD CAUSE SHOWN, IT IS SO ORDERED.**

17 Dated 9-21-2023

18   
19 UNITED STATES MAGISTRATE JUDGE